

REC # 8027961
FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

14 MAR 24 AM 8:40

Case No. 8:14CV14 OFFICE OF THE CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

PRO SE CIVIL COMPLAINT

CASE CAPTION

1. Plaintiff: Address: Telephone No.
RANDALL S. KRAUSE 604 S. 22nd St. Apt. 515 Omaha, NE 68102 (402) 206-7045
2. Defendant:
CITY OF OMAHA

STATEMENT OF CLAIM

3. Defendant applies materials to roads in the City of Omaha for de-icing during the winter season.
4. Defendant abandons the materials after they are applied. They are allowed to accumulate.
5. Plaintiff asserts that the materials become solid waste after they have served their purpose. Defendant does not acknowledge that the materials become solid waste under the laws of the United States.

STATEMENT OF JURISDICTION

6. Solid waste is defined under the laws of the United States.

STATEMENT OF VENUE

7. Defendant is a political subdivision of the State of Nebraska.

RELIEF

8. Plaintiff seeks a declaratory judgment as to whether the materials applied by the Defendant to roads in the City of Omaha for de-icing during the winter season become solid waste under the laws of the United States after they have served their purpose.

EXHAUSTION OF ADMINISTRATIVE PROCEDURES

9. Administrative procedures for declaratory judgments are not available.

TRIAL METHOD

10. Plaintiff requests a trial by judge.

VERIFICATION

11. I declare under penalty of perjury that the foregoing is true and correct.

3/24/2014
Date Executed

Randall S. Krause
Signature of Plaintiff